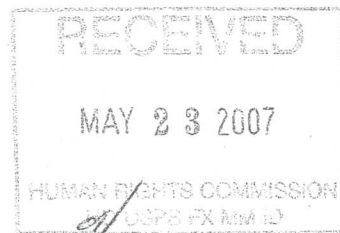


STATE OF ILLINOIS  
HUMAN RIGHTS COMMISSION



IN THE MATTER OF:

Erica L. Steele

Complainant(s),

and

APL LOGISTICS

Respondent(s).)

CHARGE NO:

0006 CF 3078

EEOC NO:

ALS NO:

DEPT. OF HUMAN RIGHTS  
SWITCHBOARD

MAY 23 2007

COMPLAINT OF CIVIL RIGHTS VIOLATION

- 1) My name is: Erica L. Steele
- 2) The name of the Respondent is: APL LOGISTICS
- 3) I filed a Charge of discrimination against the Respondent with the Illinois Department of Human Rights on 5-18-2006. [A copy of your verified Charge should be submitted with this Complaint.]
- 4) The Respondent violated the Human Rights Act in the following way: [State precisely how the Respondent violated the Human Rights Act. Give names, dates, places, etc. State which part of the Human Rights Act was violated (for example, there was discrimination based on race, religion, national origin, etc.). If you desire, you may attach the copy of your Charge, and incorporate it by reference. If you wish to make the Charge part of this Complaint, please check the following box and attach the copy of the Charge.] ☒

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VERIFICATION

I do hereby swear or affirm that the facts set out in this Complaint of Civil Rights Violation are true.

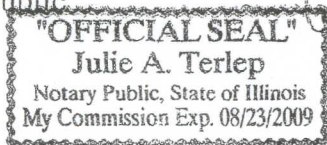
Erica L. Steele

Complainant

Subscribed and sworn to before me on this 03 day of May, 2007.

Julie A. Terlep

Notary Public

SERVICE

I ask that the Commission serve a copy of the Complaint in this case on the Respondent by sending it to:

APL LOGISTICS

who is the

Manager / Human Resources

(Insert the official title of the person)

of/for Respondent. His/Her address is:

715 Theodore Court


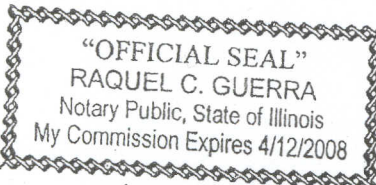
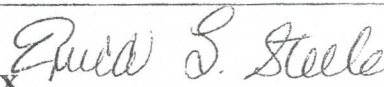
Pennepville, IL 60549

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[Please note:

YOU MUST TAKE A COPY OF YOUR COMPLAINT TO THE DEPARTMENT OF HUMAN RIGHTS AND GIVE IT TO THE DEPARTMENT ON THE SAME DAY YOU FILE YOUR COMPLAINT WITH THE COMMISSION. IN CHICAGO, THE DEPARTMENT IS LOCATED ON THE TENTH FLOOR OF THE THOMPSON CENTER.]



|  |  |   |                      |
|--|--|---|----------------------|
| <b>CHARGE OF DISCRIMINATION</b>  |  | <b>AGENCY</b>   | <b>CHARGE NUMBER</b> |
| This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form.   |  | <input checked="checked" type="checkbox"/> IDHR<br><br><input type="checkbox"/> EEOC  | 2006CF3078           |
| (06W0517-11)   |  |   |                      |
| <b>Illinois Department of Human Rights and EEOC</b>  |  |   |                      |
| NAME (indicate Mr. Ms. Mrs.)<br><b>Ms. Erica Willis Steele</b>   |  | HOME TELEPHONE (include area code)<br><b>(815) 372-2299</b>   |                      |
| STREET ADDRESS<br><b>14126 Faulkner Court</b>  |  | CITY, STATE AND ZIP CODE<br><b>Plainfield, IL. 60544</b>  | DATE OF BIRTH        |
| NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE LIST BELOW)  |  |   |                      |
| NAME<br><b>APL Logistics</b>   | NUMBER OF EMPLOYEES, MEMBERS 15+<br><b></b>              | TELEPHONE<br><b>(815) 372-1963</b>  |                      |
| STREET ADDRESS<br><b>715 Theodore Court</b>  | CITY, STATE AND ZIP CODE<br><b>Romeoville, IL. 60549</b> | COUNTY<br><b>Will (197)</b>   |                      |
| CAUSE OF DISCRIMINATION BASED ON:<br><br><b>Race      Retaliation</b>  |  | DATE OF DISCRIMINATION<br><br>EARLIEST (ADEA/EPA) LATEST (ALL)<br><div style="text-align: right;"><b>05/15/06</b></div> <input type="checkbox"/> CONTINUING ACTION  |                      |
| THE PARTICULARS ARE (if additional space is needed attach extra sheets)  |  |   |                      |
| <p><b>I.      A.      ISSUE/BASIS</b></p> <p style="text-align: center;"><b>SEXUAL HARASSMENT, BEGINNING ON OR ABOUT JANUARY 2, 2006 AND CONTINUING THROUGH MAY 15, 2006.</b></p> <p><b>B.      PRIMA FACIE ALLEGATIONS</b></p> <p style="margin-left: 40px;">1. My sex is female.</p> <p style="margin-left: 40px;">2. I have satisfactorily performed my duties as a Customer Service Representative, and have been employed with Respondent since January 24, 2005.</p> <p><b>(Continued)</b></p> |  |   |                      |
| I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  |  | SUBSCRIBED AND SWORN TO BEFORE ME ON THIS<br><div style="text-align: center;"> 5/18/06</div> <div style="display: flex; justify-content: space-between;"> <span>NOTARY SIGNATURE</span> <span>MONTH DATE-YEAR</span> </div>   |                      |
| <br><b>NOTARY SEAL</b>  |  | <div style="text-align: center;"> 5-18-2006</div> <div style="display: flex; justify-content: space-between;"> <span>SIGNATURE OF COMPLAINANT</span> <span>DATE</span> </div> <p style="font-size: x-small;">I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief</p> |                      |

**Charge Number: 2006CF3078**

**Erica Willis Steele**

**Page 2**

3. Beginning on or about January 1, 2006 and continuing through May 15, 2006, I have experienced on or more incidents of sexual harassment in Respondent's workplace from Stephen McElrath (male), Respondent's Postal Supervisor. During this period of time, McElrath has engaged in numerous actions which I perceived to be sexually offensive and harassing, such as engaging in inappropriate touching activities; by attempting to hug me; by making verbal statements, such as I didn't know that you had such groceries back there; or, I'd leave my wife for you; you look good in those jeans, and other numerous comments which I believe to be offensive, derogatory and unprofessional.
4. I stated my objections to McElrath that I perceived his actions to be sexually offensive and that I wanted him to stop, but McElrath failed to refrain from his negative, sexually offensive, unprofessional behavior.
5. I then notified Mary Warner (female), Respondent's Human Resources Representative, about McElrath's activities towards me, and sought her assistance in eliminating McElrath's behavior. Warner responded by stating that she would talk to Respondent's general manager about it, but failed to take any other action to have Respondent's supervisor cease and desist from engaging in his negative activity.
6. Respondent's actions have created a work environment which has become egregious, hostile, and offensive, and has affected my ability to perform the essential duties of my job.

**II. A. ISSUE/BASIS**

**HARASSMENT, BEGINNING ON OR ABOUT MAY 12, 2006 AND  
CONTINUING THROUGH MAY 15, 2006, BECAUSE OF MY RACE, BLACK.**

**B. PRIMA FACIE ALLEGATIONS**

1. My race is black.

(Continued)